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PROGRESSIVE NORTHERN INSURANCE CO.

UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

DENISE MEDINA,

Plaintiff,

vs.

PROGRESSIVE NORTHERN INSURANCE
COMPANY, MOISES MEDINA, DOES I-V, and
ROE CORPORATIONS I-V, inclusive,

Defendants.

MOISES MEDINA,

Crossclaimant,

PROGRESSIVE NORTHERN INSURANCE
COMPANY,

Crossdefendant

Case No.: 2:15-CV-00835-KJD-PAL

STIPULATION AND ORDER TO EXTEND TIME
FOR FILING OF DISCOVERY PLAN AND
SCHEDULING ORDER
(First Request)

Pursuant to Local Civil Rule 6-2, the parties, by and through their respective counsel,
hereby stipulated as follows:

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WHEREAS, Denise Medina filed her Complaint in the Eighth Judicial District Court, Case Number A-15-716299-C, on April 1, 2015;

WHEREAS Defendant Progressive Northern Insurance Company filed its Petition for Removal (CM/EMF Doc. 1) on May 4, 2015;

WHEREAS Progressive filed a Motion to Dismiss Denise's Complaint (CM/EMF Doc. 4) on May 11, 2015;

WHEREAS Moises Medina filed his Answer and Crossclaims Against Progressive (CM/ECF Doc. 12) on June 5, 2015;

WHEREAS, Progressive filed Countermotion to Dismiss Moises Medina (CM/EMF Doc. 17) on June 17, 2015;

WHEREAS, Progressive filed a Motion to Dismiss Moises' Crossclaim Against Progressive (CM/EMF Doc. 23) on July 7, 2015;

IT IS HEREBY STIPULATED by and between Denise, Moises, and Progressive, through their respective counsel of record, that the filing of the Discovery Plan and Scheduling Order is extended until fifteen days after the Orders on Progressive's Motions to Dismiss have been entered.

DATED this 9th day of July, 2015

DATED this 9th day of July, 2015

KEATING LAW GROUP

STEPHENS, GOURLEY & BYWATER, P.C.

/s/ Ian C. Estrada

/s/ David Stephens

JOHN T. KEATING

DAVID STEPHENS, ESQ.

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Moises Medina

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Progressive Northern Insurance Co.

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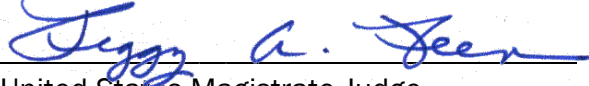
1 DATED this 9th day of July, 2015

2
3 **CHRISTENSEN LAW OFFICES**

4 /s/ Cara Xidis
5 THOMAS CHRISTENSEN
6 Nevada Bar No. 2326
7 CARA XIDIS
8 Nevada Bar No. 11743
9 1000 South Valley View Blvd.
10 Las Vegas, Nevada 89107
11 *Attorneys for Plaintiff, Denise Medina*

12 **ORDER**

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14 **IT IS SO ORDERED** this 14th day of July, 2015.

15
16 
17 United States Magistrate Judge

18 Respectfully Submitted by:

19
20 **KEATING** LAW GROUP

21 /s/ Ian C. Estrada
22 JOHN T. KEATING
23 Nevada Bar No.: 6373
24 IAN C. ESTRADA
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